

**Email From: Doug Crabtree, Montana Department of Agriculture**

**Subject:** Addition of materials to the National List, re: docket number TMD -02-03

To whom it may concern:

I wish to express my opposition to the inclusion of additional synthetic materials to the National List of approved materials for use in organic production. Specifically, I object to Copper sulfate, ethylene gas and peracetic acid being added to section 205.601; DL Methionine to 205.603; and Ethylene to 205.605.

Organic systems have traditionally been based on minimizing the use of and dependence on purchased inputs, especially synthetic substances. Allowing additional synthetic materials onto the National List will continue a disturbing trend of moving organic systems away from this basis tenent. Organic systems must not be allowed to depend on external purchased inputs. Such reliance reduces the sustainability of the production systems.

Doug  
Doug Crabtree  
Organic Certification Program Manager  
Montana Department of Agriculture